

THE ROSEN LAW FIRM, P.A.

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Co-Lead Counsel for Lead Plaintiffs

[additional counsel on signature page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AMY CHAN, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

vs.

NEW ORIENTAL EDUCATION &
TECHNOLOGY GROUP INC.,
MICHAEL MINHONG YU,
CHENGGANG ZHOU, and ZHIHUI
YANG,

Defendants.

Case No. 2:16-cv-09279-KSH-CLW

**STIPULATION SETTING SCHEDULE FOR: (1) FILING AN
AMENDED COMPLAINT; AND (2) BRIEFING ON MOTION TO DISMISS**

WHEREAS, on December 15, 2016, Plaintiff Amy Chan, individually and on behalf of all others similarly situated, filed the above-captioned action against

Defendants New Oriental Education & Technology Group Inc. (“New Oriental”), Michael Minhong Yu, Chenggang Zhou, and Zhihui Yang;

WHEREAS, this action is subject to the procedural requirements of the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4, which requires the appointment of Lead Plaintiff and Lead Counsel;

WHEREAS, on March 30, 2017, Amy Chan, Steven Wade, and Shunfeng Cheng (“Plaintiffs”) were appointed as Lead Plaintiffs, and The Rosen Law Firm, P.A. and Pomerantz LLP were appointed as Co-Lead Counsel in this Action;

WHEREAS, Plaintiffs intend to file an amended Complaint;

WHEREAS, counsel for Plaintiffs and counsel for Defendant New Oriental, have met and conferred and they agree that it would be more efficient to: (i) extend the time for New Oriental to answer or otherwise respond to the Complaint in this action until after the Plaintiffs file an amended Complaint; and (ii) establish a briefing schedule for New Oriental’s anticipated motion to dismiss the amended Complaint.

NOW THEREFORE, Plaintiffs and New Oriental, through their respective counsel listed below, agree and stipulate as follows:

1. New Oriental need not answer, move, or otherwise respond to any Complaint in this action until the date set below following the Plaintiffs’ filing of an amended Complaint.

2. Plaintiffs shall file their amended Complaint on or before May 30, 2017.
3. Upon the filing of an amended Complaint, New Oriental shall have sixty (60) days to answer, move, or otherwise respond to the amended Complaint; Plaintiffs shall have sixty (60) days to file opposition(s) to any motion(s) to dismiss filed by New Oriental; and New Oriental shall have thirty (30) days to file replies to Plaintiffs' opposition(s).
4. This Stipulation is entered into without prejudice to any party seeking any interim relief.

IT IS SO STIPULATED.

DATED: May 3, 2017

THE ROSEN LAW FIRM, P.A.

By: /s/ Laurence M. Rosen
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-and-

POMERANTZ LLP

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*Co-Lead Counsel for Lead Plaintiffs Amy
Chan, Steven Wade, and Shunfeng Cheng,
and the putative Class*

DATED: May 3, 2017

**SKADDEN ARPS SLATE MEAGHER &
FLOM LLP**

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*Attorneys for Defendant New Oriental
Education & Technology Group Inc.*

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 3, 2017.

Dated: May 3, 2017

/s/ Laurence Rosen